



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105-3901

JUL 06 1992

CERTIFIED MAIL NO. P 765 056 091
RETURN RECEIPT REQUESTED
File Number: 104.1343William Sullivan
Corporate Counsel
Lockheed Corporation
4500 Park Granada Blvd.
Calabasas, CA 91399RE: Request for Information
Lockheed Plant C-1 and Building 528
10780 and 10811 Sherman Way
Burbank, California

Dear Mr. Sullivan:

As you know, the United States Environmental Protection Agency (EPA) is conducting an investigation of soil and groundwater contamination and threatened contamination in the San Fernando Valley. The purpose of this investigation is to determine the nature, cause, and extent of the release of hazardous substances in the area; to determine the source(s) or potential source(s) of such releases and/or potentially responsible parties; and to assess the effects of any contamination on the environment and public health.

As part of this investigation, EPA needs additional information to supplement your previous response. Therefore, pursuant to the authority of Section 104 of CERCLA, 42 U.S.C. § 9604, and Section 3007 of RCRA, 42 U.S.C. § 6972, Lockheed Corporation is hereby requested to respond to the Information Request set forth herein.

Compliance with the Information Request is mandatory. Failure to respond fully and truthfully within thirty-five (35) days of receipt can result in enforcement action by EPA pursuant to Section 104(e) of CERCLA, as amended, and/or Section 3008 of RCRA. Each of these statutes permits EPA to seek imposition of penalties of up to twenty-five thousand dollars (\$25,000) for each day of continued noncompliance. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001 or Section 3008(d) of RCRA.

Pursuant to 40 CFR § 2.310(h), you are hereby furnished with notice of the contemplated disclosure by EPA of the information provided in response to this Information Request to authorized representatives of EPA. Any comments on this contemplated action

must be submitted to EPA at the 75 Hawthorne Street address specified below within thirty-five (35) days of receipt of this Information Request.

The information that EPA plans to disclose to its authorized representatives includes any response to this Information Request. The authorized representatives of EPA to which EPA may disclose information contained in your response are as follows:

1. PRC Environmental Management, Inc.
EPA Contract Number 068-W9-0009
2. CH2M Hill California, Inc.
EPA Contract Number 068-W9-0031
3. Labat-Anderson, Inc.
EPA Contract Number 068-W9-0052
4. California State Water Resources Control Board and
California Regional Water Quality Control Board, Los
Angeles Region
EPA Cooperative Agreement Number V-009472-01-4

This information may be made available to these authorized representatives of EPA for any or all of the following reasons: to assist with document handling, inventory, and indexing; to assist with document review and analysis for verification of completeness; and to provide expert technical review of the contents of the response. Pursuant to 40 C.F.R. § 2.310(h), you may submit comments on EPA's disclosure of any confidential information contained in your response by EPA to its authorized representatives.

You must respond to the following Information Request by letter, signed by a duly authorized officer of the company, submitted by certified mail to the address specified below within thirty-five (35) days of your receipt of this Request.

Your response should include the name, address, and telephone number of the person to whom EPA should direct future correspondence in regard to this matter.

If you are not claiming confidentiality in regard to your response, or if you are claiming confidentiality in regard to your response but do not have any comments to submit to EPA regarding EPA's disclosure of such confidential information to its authorized representatives, submit your response to:

Chris Stubbs
South Coast Groundwater Section (H-6-4)
United States Environmental Protection Agency
P.O. Box 193036
San Francisco, CA 94119-3036

If you are claiming confidentiality in regard to your response and have comments to submit to EPA regarding EPA's disclosure of such confidential information to its authorized representatives, submit your response and any comments regarding the disclosure of your response to authorized representatives of EPA to:


Chris Stubbs
South Coast Groundwater Section (H-6-4)
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Please include in your response to the Information Request a notarized affidavit on behalf of Lockheed Corporation stating that a diligent record search has been completed and that there has been a diligent interview of present and former employees who may have knowledge of the requested information. Also include in the affidavit a statement that all information responsive to the Information Request has been forwarded to EPA.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, et seq.

If you need further information concerning technical issues, please contact Chris Stubbs at (415) 744-2248. If you have any legal questions please contact, or have your attorney contact, Marcia Preston, Assistant Regional Counsel, at (415) 744-1388.

Sincerely yours,


for Keith A. Takata
Deputy Director
Office of Superfund Programs

Attachment

cc: Robert Ghirelli, Executive Officer
Los Angeles Regional Water Quality Control Board

✓ Chris Stubbs, South Coast Groundwater Section, H-6-4

Marcia Preston, Assistant Regional Counsel, ORC

INFORMATION REQUEST

Instructions

1. A separate response must be made to each of the Questions set forth in this Information Request.
2. Precede each answer with the number of the question to which it corresponds.
3. Should you find at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA thereof as soon as possible.
4. For each document produced in response to this Information Request indicate on the document, or in some other reasonable manner, the number of the Question to which it responds.
5. For each and every Question contained herein, identify all documents consulted or referred to in the preparation of the answer and provide true and accurate copies of all such documents.
6. For each and every Question contained herein, if you have reason to believe that there may be persons able to provide a more detailed or complete response to any Questions contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.
7. For each and every Question contained herein, if information responsive to this Information Request is not in your possession, custody, or control, then identify any persons from whom you believe such information may be obtained.
8. The information requested herein must be provided notwithstanding its possible characterization as confidential information or trade secrets. You may, if you desire, assert a confidentiality claim covering part or all of the information requested, pursuant to Section 104(e)(7) of CERCLA, as amended by SARA, 42 U.S.C. § 9604(e)(7), and 40 C.F.R. 2.203(b), by attaching to such information at the time it is submitted a cover sheet, stamped or typed legend, or some other suitable form of notice employing language such as "trade secret" or "proprietary". Information covered by such a claim will be disclosed by EPA only to the extent and only by means of the procedures set forth in CERCLA Section 104(e)(7). If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. You should read the above cited regulations carefully before asserting a business

confidentiality claim, since certain categories of information are not properly the subject of such a claim.

9. Where specific information has not been memorialized in any document, but is nonetheless responsive to a Question, you must respond to the Question with a written response.

Definitions

The following definitions shall apply to the following words as they appear in this Information Request.

1. The term "you" or "Respondent" shall mean the company named in the address of this Request, the company's officers, managers, employees, contractors, trustees, successors, assigns, and agents.
2. The term "person" as used herein includes, in the plural as well as the singular, any natural person, firm, unincorporated association, partnership, corporation, trust or other entity.
3. The term "the facility" shall mean and include the property on or about 10780 and 10811 Sherman Way, Burbank, California commonly referred to as Plant C-1 and Building 528.
4. The term "hazardous substance" shall have the definition set forth in Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), and includes any mixtures of such hazardous substances with any other substances, including petroleum products.
5. The term "pollutant or contaminant" shall have the definition set forth in Section 101(33) of CERCLA, 42 U.S.C. § 9601(33), and includes any mixtures of such pollutants and contaminants with any other substances, including petroleum products.
6. The term "hazardous waste" shall have the definition set forth in Section 1004(5) of RCRA, 42 U.S.C. § 6903(5).
7. The term "solid waste" shall have the definition set forth in Section 1004(27) of RCRA, 42 U.S.C. § 6903(27).
8. The term "hazardous material" shall mean all hazardous substances, pollutants, and contaminants as defined above.
9. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.

10. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship) to set forth its full name, address, legal form (e.g. corporation, partnership, etc.), organization, if any, and a brief description of its business.
11. The term "identify" means, with respect to a document, to provide its customary business description, its date, its number if any (e.g. invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or subject matter.
12. The term "release" shall have the definition contained in Section 101(22) of CERCLA, 42 U.S.C. § 9601(22), and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance, pollutant or contaminant.
13. The terms "document" and "documents" shall include: (a) writing of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, interoffice or intraoffice communications, photostat or other copy of any documents, microfilm or film record, any photograph, sound recording on any type of device, any punch card, disk or disk pack; (b) any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disk or disk pack, tape or other type of memory and together with printouts of such punch card, disk, or disk pack, tape or other type of memory); (c) every copy of each document which is not an exact duplicate of a document which is produced; (d) every copy which has any writing, figure or notation, annotation or the like of it; (e) drafts; (f) attachments to or enclosures with any document; and (g) every document referred to in any other document.
14. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.

15. The term "arrangement" means every separate contract or other agreement between two or more persons.

Questions

1. Provide an index of all existing technical or analytical information about the facility relating to environmental investigations including, but not limited to, data and documents related to soil, water (ground and surface), geology, hydrogeology, or air quality on and about the facility. Include the title, author, date and a description of the information as part of each index entry.
2. Provide a copy of Report of Subsurface Investigation Beneath Metal Salvage Area, Lockheed Aeronautical Systems Company, Plant C-1, Burbank, California by Gregg and Associates, Inc. dated on or about April 4, 1988.
3. Provide a copy of Environmental Assessment, Lockheed Plant C-1, Burbank, California by McLaren/Hart dated on or about November 3, 1988.
4. State the dates during which Respondent owned, operated, or leased any portion of the facility, and provide copies of all documents evidencing or relating to such ownership, operation or lease including, but not limited to, purchase and sale agreements, deeds and leases.
5. Identify all prior owners of the facility. For each prior owner further identify:
 - a. The dates of ownership;
 - b. All evidence that hazardous materials were released or threatened to be released at the facility during the period that they owned the facility.
6. Identify the prior operators and lessees of the facility. For each such operator or lessee, further identify:
 - a. The dates of their operations at or lease of the facility;
 - b. The nature of their operations at the facility;
 - c. All evidence that hazardous materials were released or threatened to be released at the facility during the period in which they were operating at the facility.
7. Provide a complete history of the specific uses of each of the buildings and other areas at the facility. This history

should include the dates of each different use, the industrial processes involved and the types of hazardous materials used. If the use of an area involved halogenated volatile organic compounds, identify the specific chemicals and the approximate annual quantities involved.

8. Describe the operations conducted at former Plant B-5 including the dates operations began and ended, and a description of the hazardous materials used.
9. Identify all leaks, spills, or releases or threats of releases of any kind into the environment of any hazardous materials that have occurred or may occur at or from the facility. In addition, identify:
 - a) When such release occurred;
 - b) How the releases occurred;
 - c) What hazardous materials were released;
 - d) What amount of each such hazardous material was so released;
 - e) Where such releases occurred, describe the location(s) and provide a map or diagram of such location(s);
 - f) Any and all activities undertaken in response to each such release or threatened release;
 - g) Any and all investigations of the circumstances, nature, extent, or location of each such release or threatened release, including the results of any soil, water (ground and surface), or air testing that was undertaken;
 - h) Whether any report(s) of any such release(s) was (were) made to any public agency, and the content of that (those) report(s); and
 - i) All persons with information relating to subparts a through h of this Question.

UNITED STATES POSTAL SERVICE M
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- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

RETURN
TO

Chris Stubbs, H-6-4

(Name of Sender)

U.S. EPA, Region 9

(No. and Street, Apt., Suite, P.O. Box or R.D. No.)

75 Hawthorne St.

(City, State, and ZIP Code)

San Francisco, CA 94589



PENALTY FOR PRIVATE
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PS Form 3811, July 1983 447-945

SENDER: Complete items 1, 2, 3 and 4.
Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. ☐ Show to whom, date and address of delivery.
2. ☐ Restricted Delivery.

3. Article Addressed to:

William Sullivan
Corporate Counsel
Lockheed Corporation
4500 Park Granada Blvd., Calabasas, CA

4. Type of Service:

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Article Number 91399

P 765 056 091

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L. Crutten

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